

BUCKS COUNTY DEPARTMENT OF HEALTH

July 24, 1975

79365
Bm ff

MEMORANDUM

TO: C.T. Beechwood
Regional Sanitary Engineer
DER - Region I

THROUGH: Lee W. Thomas, P.E. ~~Director~~
Bureau of Environmental Health

FROM: Albert W. Wills, P.E., Chief *A.W. Wills*
Division of Sanitary Engineering

SUBJECT: Enforcement
Manfred DeRewal - Boarhead Corp.
Bridgeton Township, Bucks County

As you know the subject case has a history of flagrant violations of the Clean Streams Law. On July 16, 1975 Peter G. Noll, Environmental Protection Specialist with this Department, found during an inspection of the Boarhead Corp. site another incident that could lead to serious stream pollution. No doubt the situation found by Mr. Noll on July 16 will be repeated unless some type of punitive enforcement action is taken. This case which dates back to February of 1973 has not had vigorous enforcement action to date and accordingly we are requesting by this memorandum your assistance in obtaining effective enforcement action.

On July 16, 1975 Peter G. Noll found that a 4,000 gallon tank truck loaded with copper ammonia carbonate was brought onto the Boarhead Corp property for repairs. Mr. Noll's inspection was prompted by a complaint by the Bridgeton Township Police that the trailer had been observed leaking its contents on the streets of Bridgeton Township while in transit to the Boarhead Corp. site. Mr. Noll observed spilled liquid from the truck on the streets leading to the Boarhead Corp. property and on the Boarhead Corp.'s driveway. Inspection of the truck by Mr. Noll revealed that the gasket on the hatch (located on top of the tanker) was broken and evidence of the liquid sloshing out the broken gasket and down the sides of the tanker was noted. Mr. DeRewal told Peter Noll that the tanker was brought to the Boarhead Corp. site for repair.

AR100024

July 24, 1975

The above situation is practically the same course of events that took place in October of 1973 when a 4,000 gallon tanker was brought to the Boarhead Corp. site for repair and allegedly during the course of repairing the tanker the 4,000 gallons in the tanker was "accidentally" spilled into the swamp, causing a major pollution incident.

The recent incident observed by Mr. Noll on July 16, 1975 is a violation of the agreement among the Department of Environmental Resources, Manfred DeRewal and the Boarhead Corp. dated March 21, 1973. Specifically Paragraph 2 of the agreement states "Furthermore no trucks loaded with industrial wastes will be parked or stored on the subject property without the prior permission to do so." In addition, on March 23, 1973 a Pollution Incident Prevention order was issued to the Boarhead Corp. No PIP has been submitted on the part of the Boarhead Corp and nothing has been implimented at the site.

It appears to this Department that unless vigorous enforcement action is taken by DER conditions are ripe for a serious pollution incident to occur at the Boarhead Corp.'s site similiar to what occured on October of 1973. For your reference we have attached a copy of the Paragraph 2 of the previously mentioned agreement, a copy of the Pollution Incident Prevention order of March, 1973 and a copy of Mr. Noll's inspection report of July 16, 1975.

As in the past a copy of the inspection report has been forwarded to the Strike Force attorney.

AWW/mtd

AR100025